

The Honorable S. Kate Vaughan

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

TSR LLC,

Plaintiff,

v.

WIZARDS OF THE COAST LLC,

Defendant.

Case No.: 2:21-cv-01705-SKV

**DECLARATION OF JUSTIN LANASA
IN SUPPORT OF COUNTERCLAIM
DEFENDANTS' RESPONSE TO
DEFENDANT AND COUNTERCLAIM
PLAINTIFF'S MOTION TO ENFORCE
THE PROTECTIVE ORDER
GOVERNING CONDUCT**

WIZARDS OF THE COAST LLC,

Counterclaim Plaintiff,

v.

TSR LLC; JUSTIN LANASA; and DUNGEON
HOBBY SHOP MUSEUM LLC,

Counterclaim Defendants.

I, Justin LaNasa, declare as follows:

1. I am the registered owner of TSR LLC ("TSR") and the Dungeon Hobby Shop Museum LLC (the "Museum"). In this declaration, I will refer to Don Semora and his company, Wizard Tower Games, collectively as "Mr. Semora." I have personal knowledge of the facts set forth herein based on my recollection and review of contemporaneous communications, and if called as a witness, I could and would testify under oath to the matters set forth herein.

1 2. Despite Wizards’ accusation and suggestion, I do not have the
2 www.donosemora.com website registered to me nor is the website within my control.

3 3. The Museum and I have obeyed the Protective Order and intend to continue to do
4 so until the case is finally finished.

5 4. Neither the Museum nor I use the handle “Anonymous member” on social media
6 or otherwise. Neither the Museum nor I own or control an “Anonymous member” Facebook
7 account.

8 5. I have read the “Anonymousemail” that states, in part: “This is not Justin or anyone
9 else who knows him.” This email was not written by me personally or on behalf of the Museum.
10 Neither the Museum nor I have ever used an “Anonymousemail” account. I have also reviewed
11 Exhibit B to Ms. Rainwater’s declaration and believe the references to “me” or “I” are those of
12 Mr. Semora. I am not “Vance K. Yarg” and I do not control the Vance K. Yarg Facebook account
13 referenced in Exhibit B.

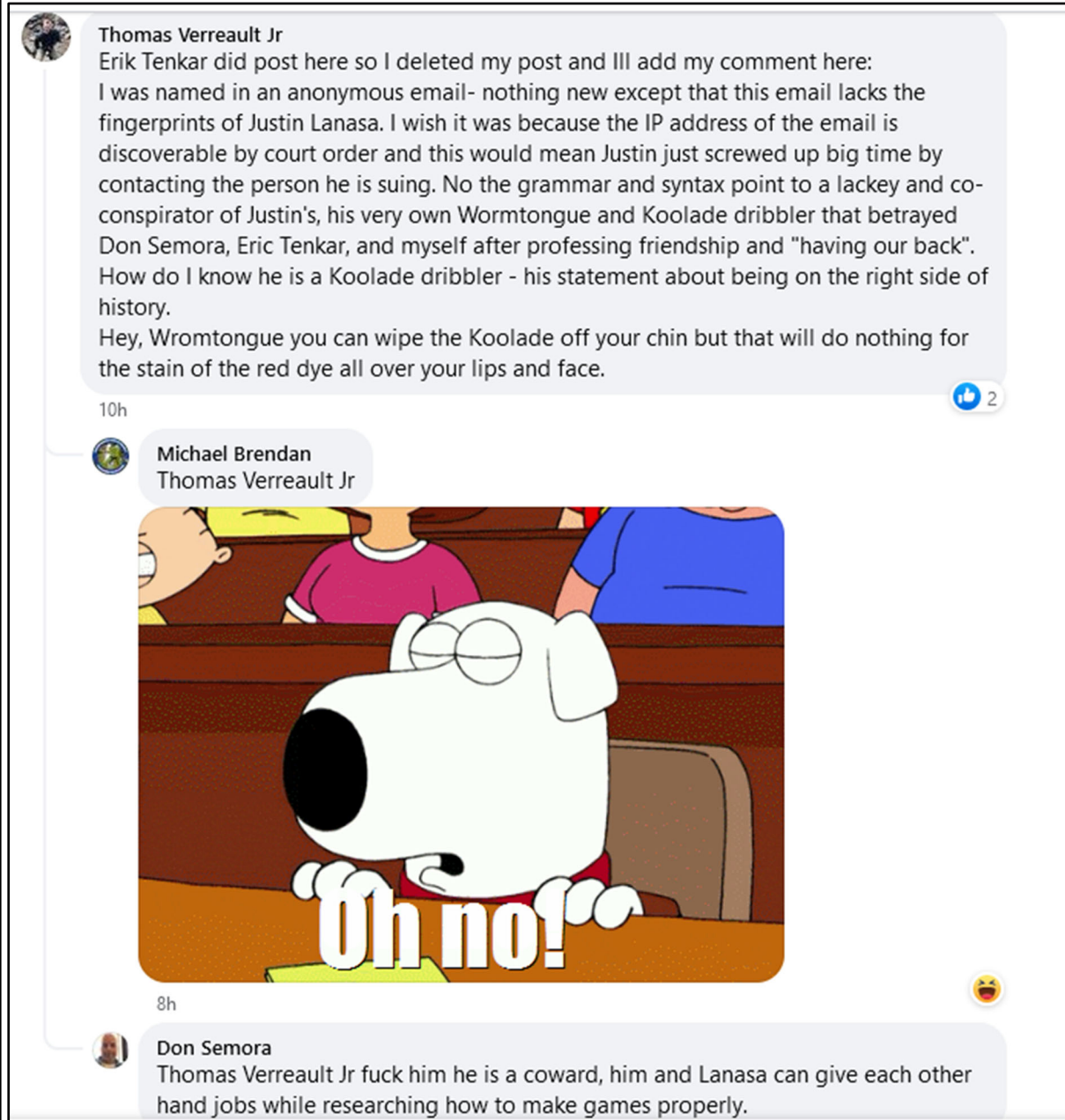
14 6. When the Museum or I want to post on social media or communicate, we each do
15 so in an open, honest, and direct way by using our own names, email accounts registered to us, our
16 known handles, or our own social media accounts that identify us openly.

17 7. I (on behalf of myself, TSR, and the Museum) welcomed the Court’s entry of a
18 Protective Order over all involved in the litigation, including third party witnesses, to bring respect
19 to the litigation process. I hoped the stipulated order would protect me from harassment that I
20 have suffered.

21 8. In the many months that I have communicated with Mr. Semora, I have never
22 intended to negatively influence Mr. Semora as a witness and instead, I welcome his participation
23 in the litigation as a witness subject to the evidence rules and under penalty of perjury.

24 9. There is a Facebook group called “Star Frontiers New Genesis discussion group
25 (unofficial)” (<https://www.facebook.com/groups/296148055926417/>) and other Facebook groups
26 or pages where Mr. Semora regularly posts comments and content aimed at harassing, insulting,

and attempting to intimidate me. Below are some examples of lewd and harassing posts by Mr. Semora.

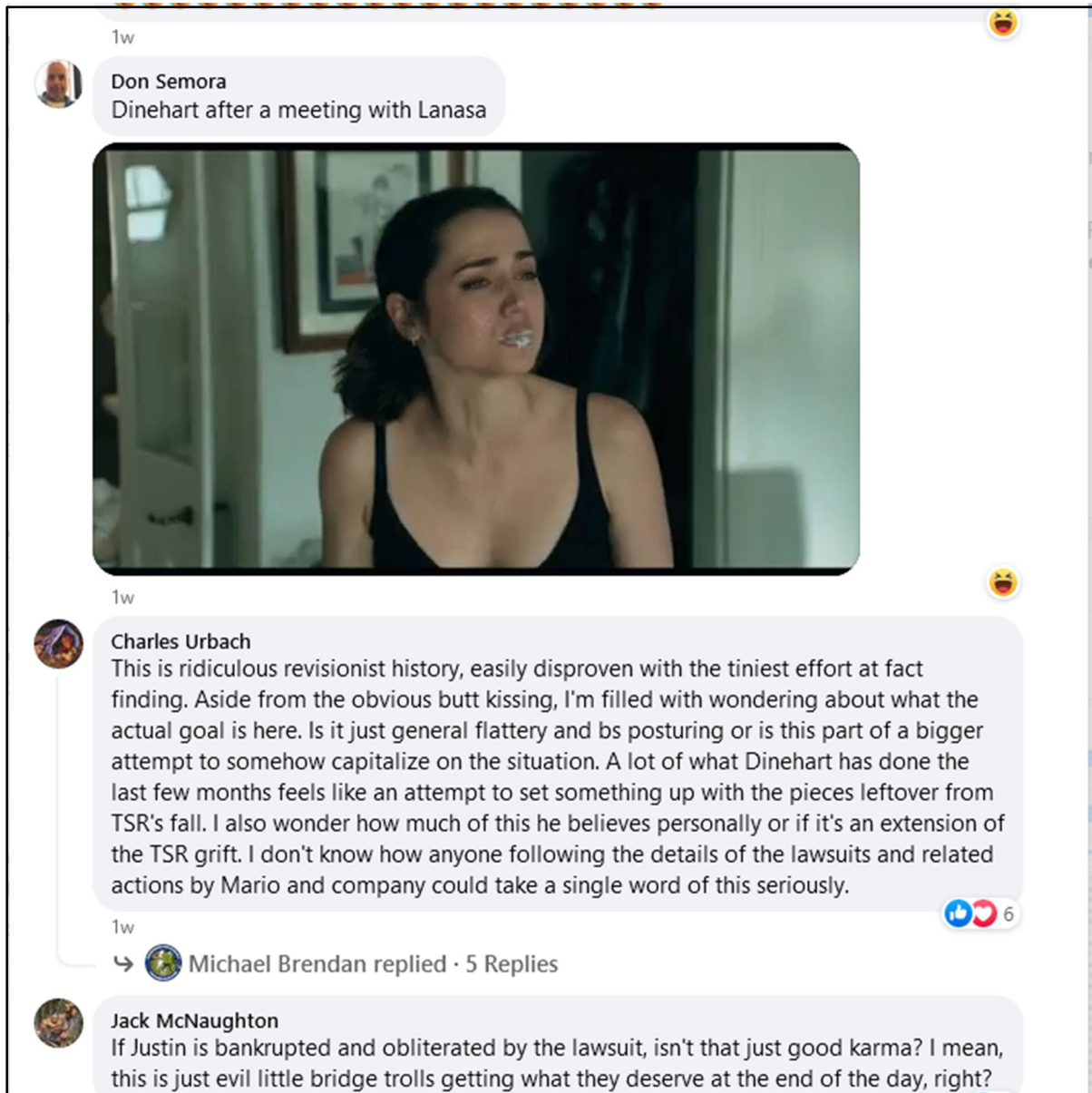


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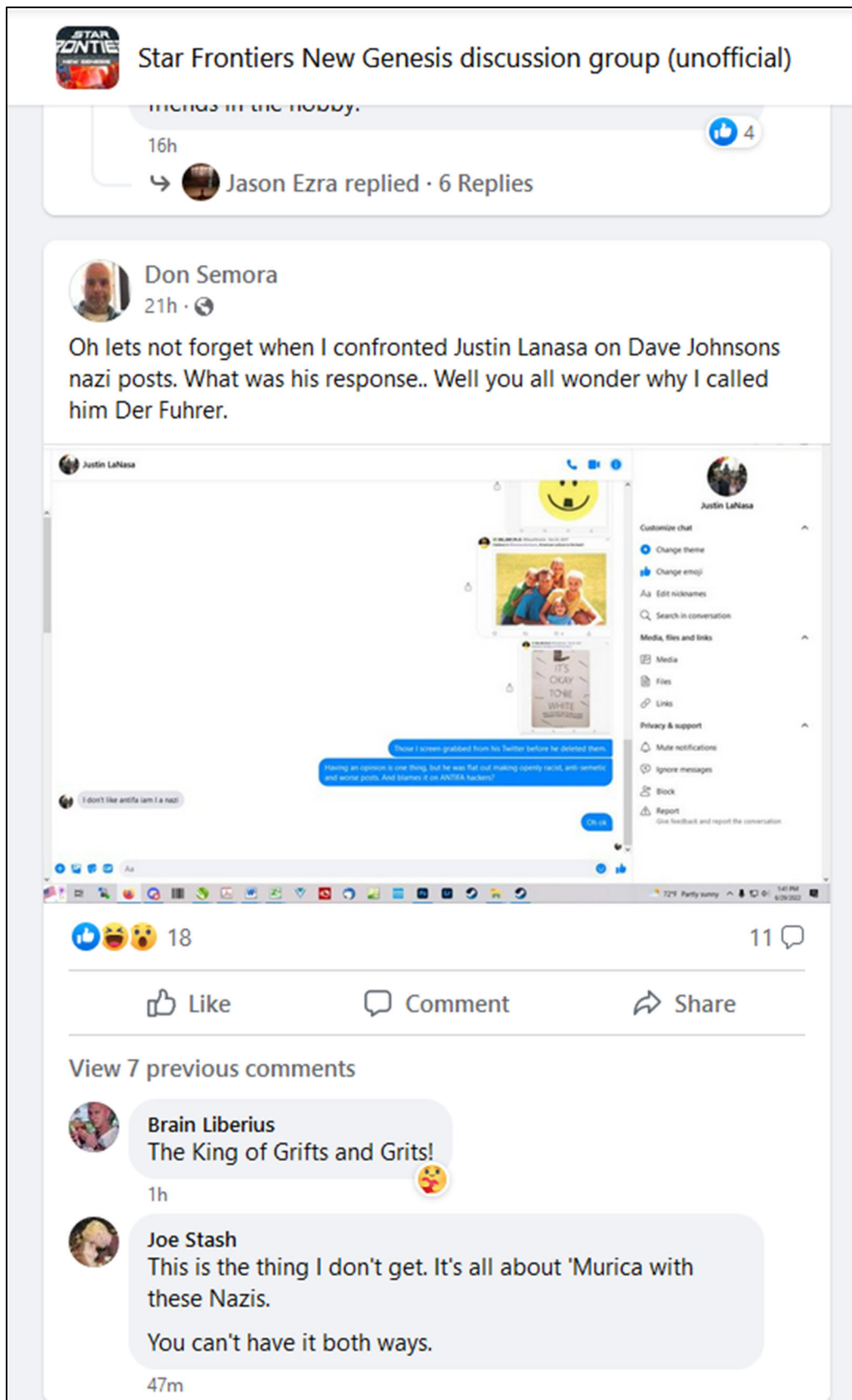
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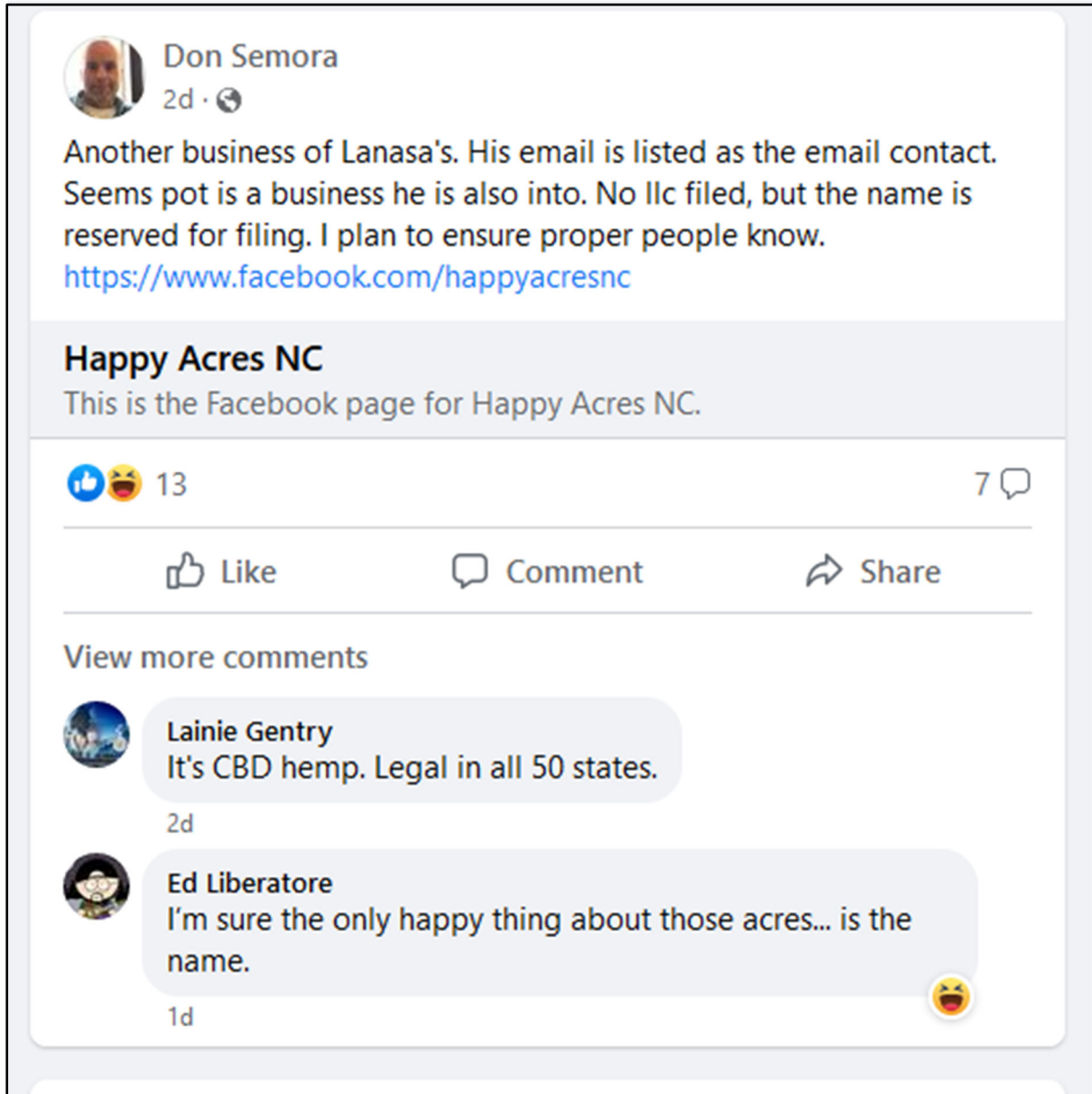
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10. Mr. Semora posted on Facebook days ago that suggests that he is tracking my business dealings and suggesting to the public that my business is not properly formed and somehow engaging in illegal activities.



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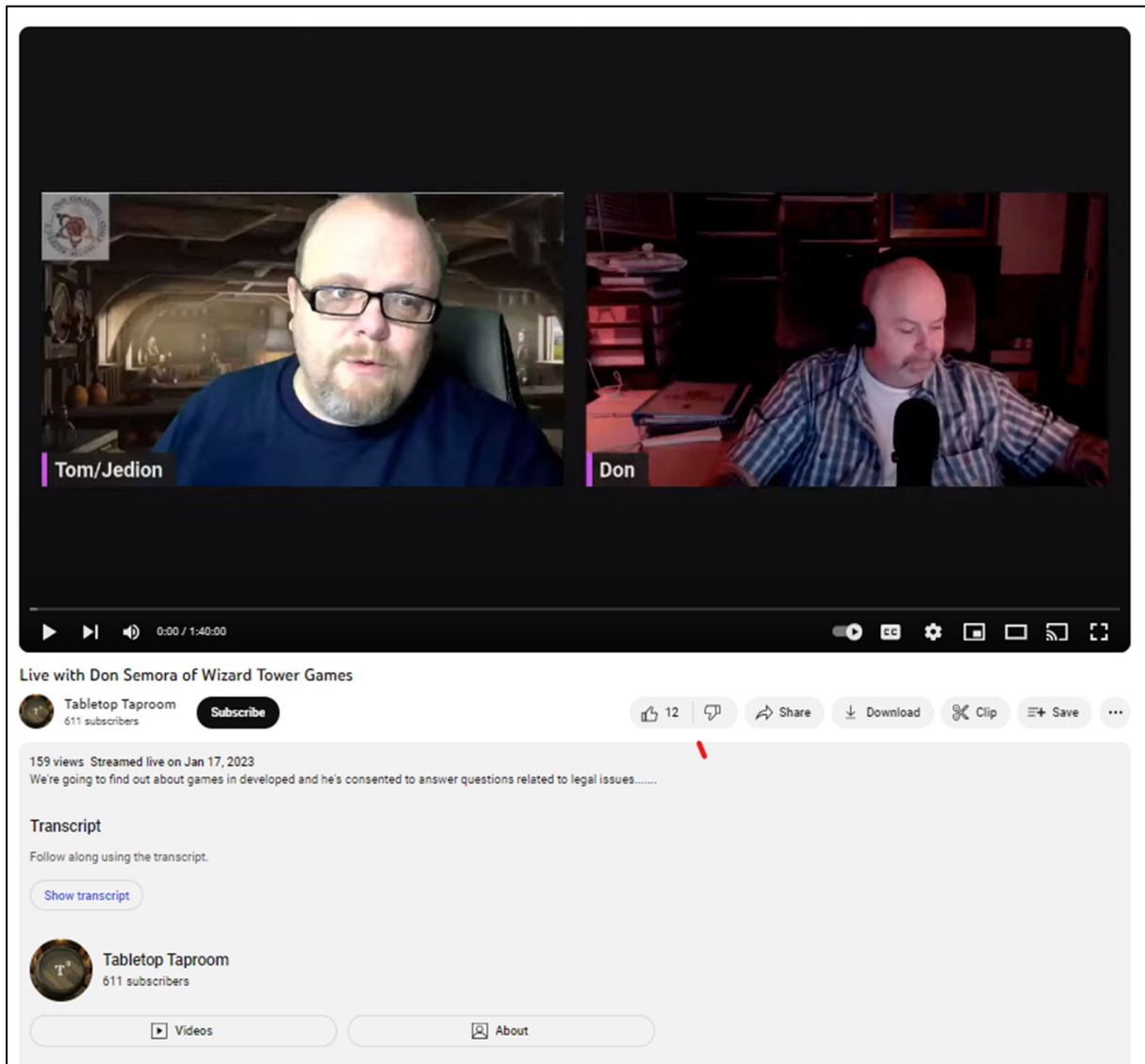
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11. Mr. Semora regularly posts content on Facebook and participates in videos on YouTube that discuss the disputes between us, the pending case in Washington, and the pending bankruptcy of TSR in North Carolina.





<https://www.youtube.com/watch?v=zFACfV-l7lE>

January 17, 2023, 161 views

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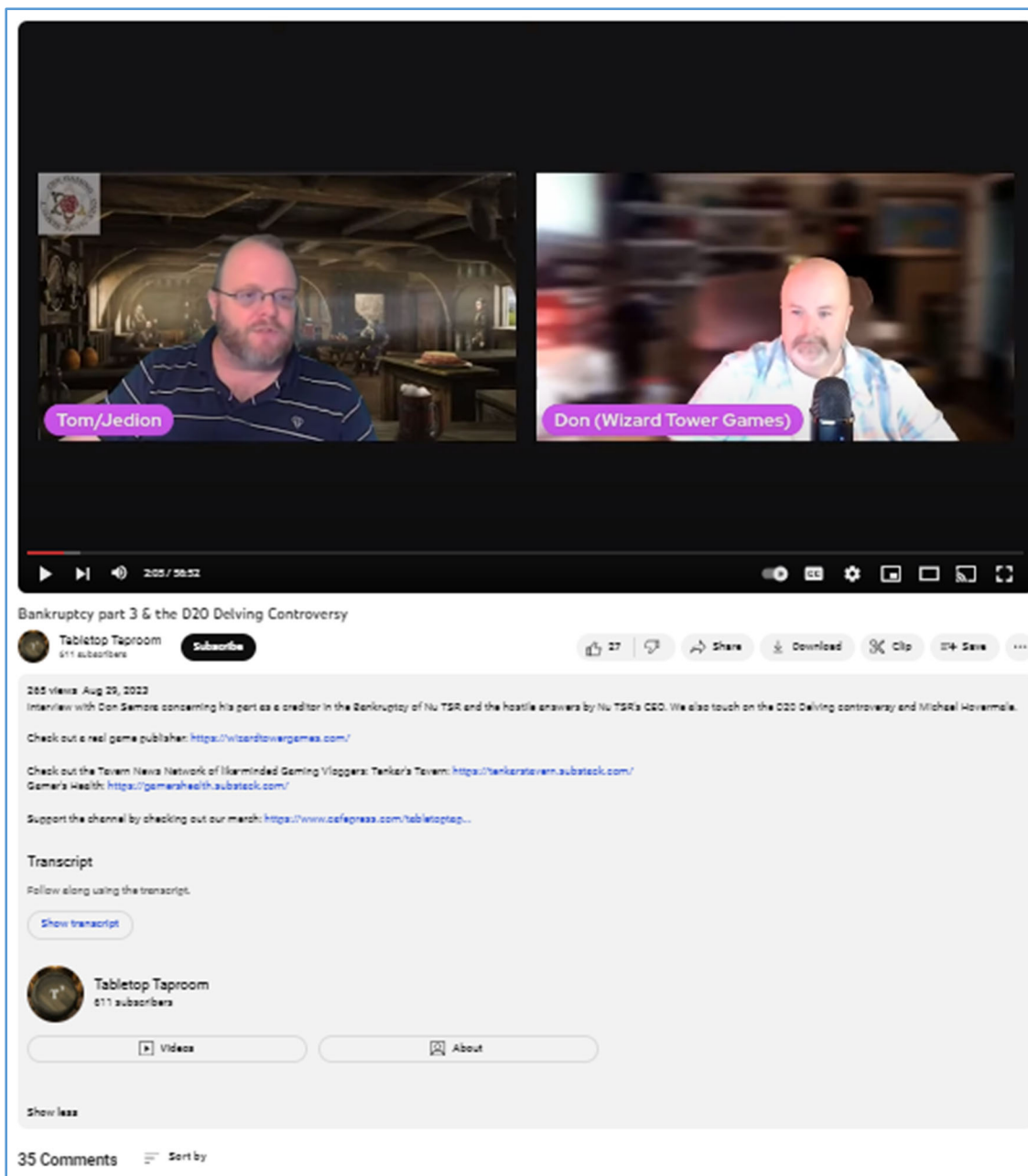
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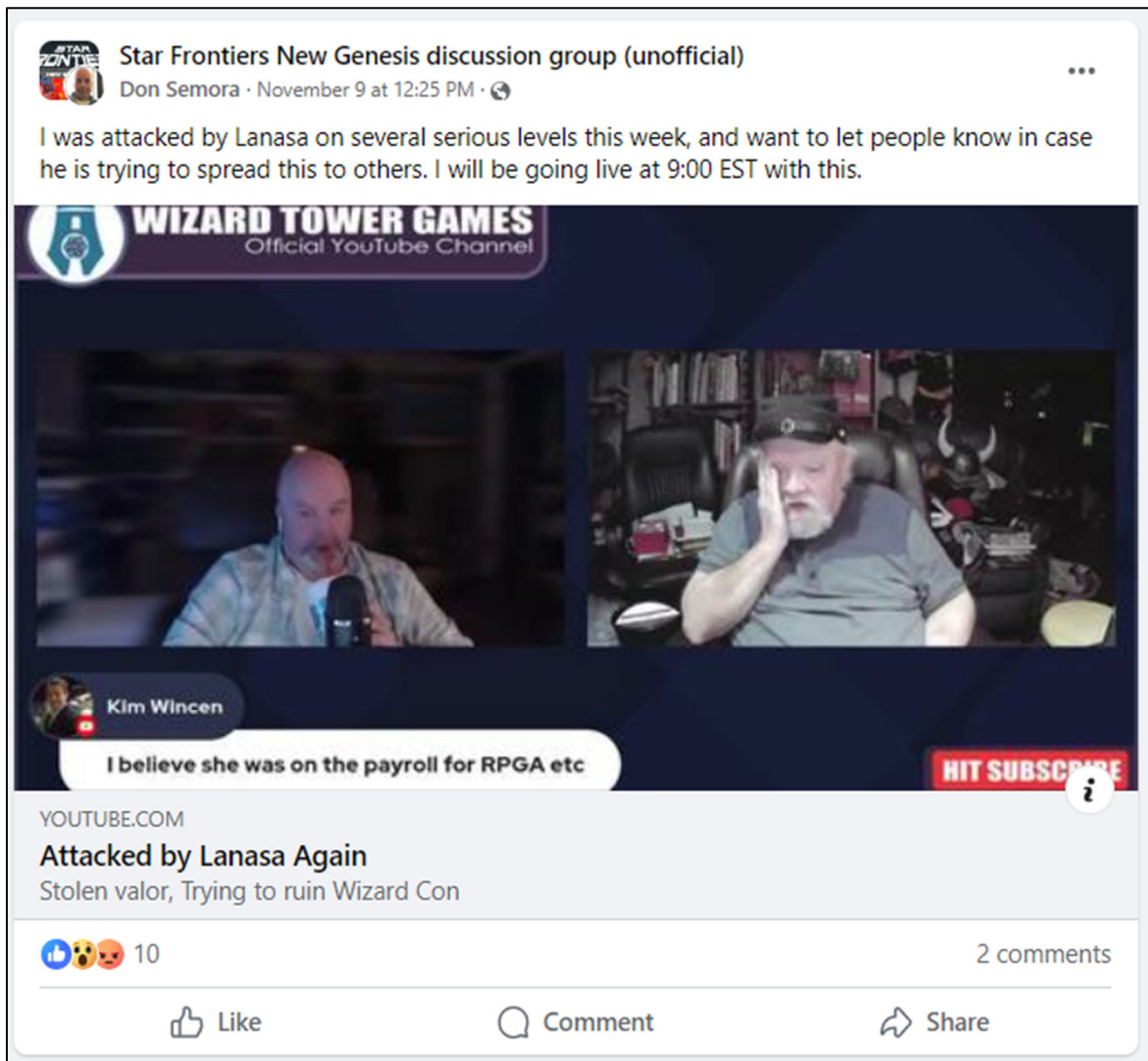
<https://www.youtube.com/watch?v=L522B3F5B3s>

August 29, 2023, 265 views

Discussion regarding Mr. Semora using Wizards' counsel for his own personal issues is at time stamp 21:56 to 24:05.

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<https://www.youtube.com/watch?v=nd-SYkBMHSU&t=1846s>

November 9, 2023, 338 views

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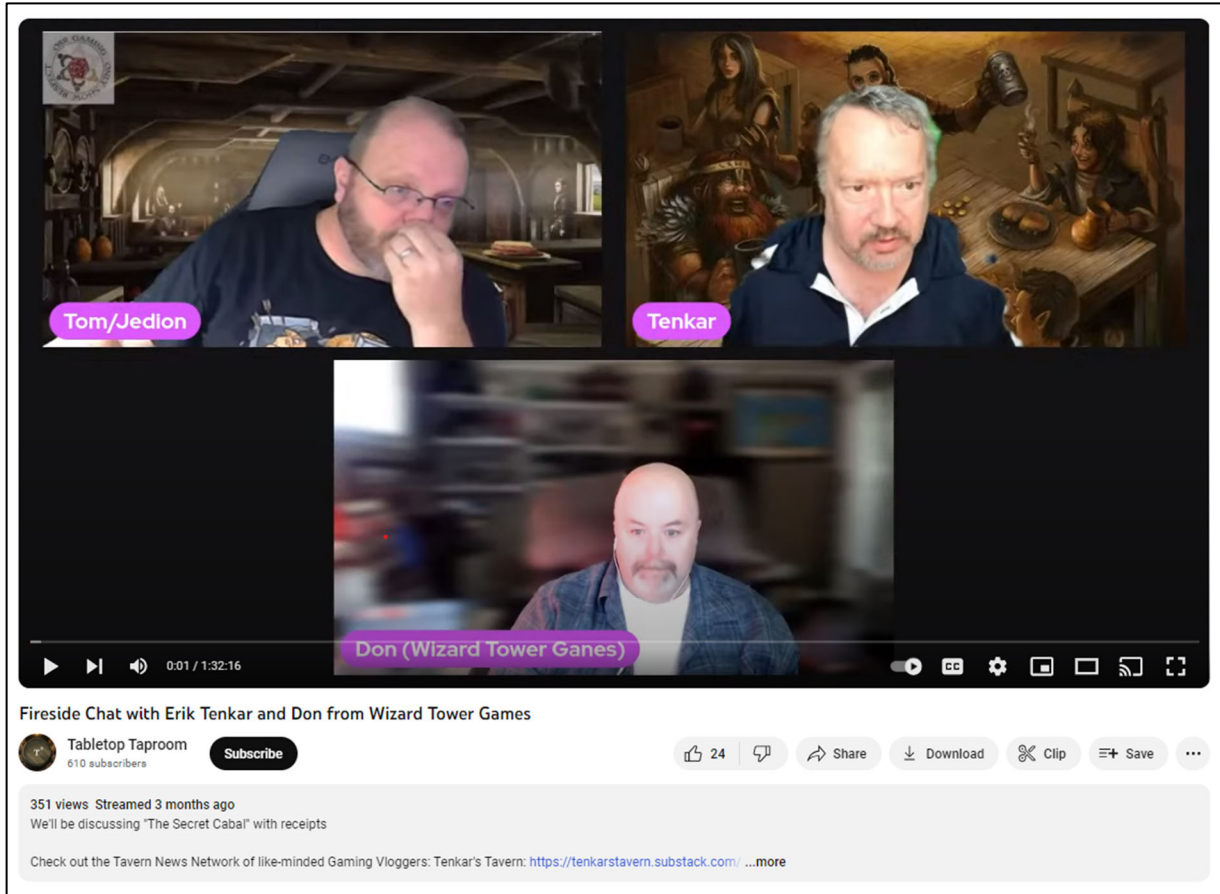
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https://www.youtube.com/watch?v=s0eOe9KQ_SI

July 28, 2023, 352 views

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Star Frontiers New Genesis discussion group (unofficial)

Counterclaim Plaintiff,


TSR LLC; JUSTIN LANASA; and DUNGEON HOBBY SHOP MUSEUM LLC,

Counterclaim Defendants.

ay of June, 2023.

S. Kate Vaughan
S. KATE VAUGHAN
United States Magist

Plaintiff and Counterclaim Defendant TSR LLC submitted notice of its pending bankruptcy action under 11 U.S.C. § 301, filed with the United States Bankruptcy Court for the Eastern District of North Carolina. Dkt. 56. As the filing of the bankruptcy petition invokes the provisions of the automatic stay under 11 U.S.C. § 362, the Court hereby ORDERS:



David Flor
1d · 🌐

And it's official... Due to NuTSR filing for bankruptcy, the case with WotC is stayed and all dates stricken from the schedule.


It's the case that never ends...

👍👎 7

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Lori Lye
By filing Chapter 7, he's made a huge mistake. Now everyone can plumb the depths of his personal finances. It also requires him to liquidate everything to pay off his creditors, which includes his properties, his home, his vehicles, and empty his bank ... See more

1d Edited

3



Don Semora
Keep in mind what this Stay does. It only puts the case on hold. It only stops those he lists as creditors from trying to collect, harass him etc. It does not prevent those he has not listed in collecting, nor does it cease the existing orders of the court.

1d

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Coffee, The Good Life, and Defamation Lawsuits

Tabletop Taproom

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152 views

2 days ago

Today we are discussing coffee, living the good life, and a recent filing in a defamation lawsuit. But also touched on it what intangible thing is it that gaming gives us? Why wouldn't someone contest being labeled a Yatzi sympathizer and criminal?
...more

5 Comments

Sort by

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@tabletoptaproom

2 days ago

I just got clarification from Don at WTG regarding the Lost Adventures. They are autographed by Tim, original scans, also converted into BECMI / Basic, AD&D 1E and 5E limited to 300 copies and the presales are going on right now and they are selling fast.

3

Reply

@wizardtowergames

2 days ago

WOTC / LANASA = This is my take. Early 2021 WOTC did not know who he was. Then they see him using their IP, so they send him a C&D, and keep in mind the C&D was not for using TSR, it was for the logos etc. I think WOTC knew based on letting Jayson using TSR they would not win. However.... Lanasa is happy, WOTC did what he was hoping, so he creates a game designed to embarrass them into paying him, he saddles with Ernie as he felt with a Gygax involved as a partner in TSR WOTC would fear him. So to make sure the deal was sealed Lanasa filed this lawsuit to force WOTC to pay him 100 million, yes I said 100 million. Lanasa bragged about that in detail on the phone with me. So, I am waiting for Lanasa to claim he never said it, as when you are on the stand and you are listening to your own words it is impossible to say I never said it. Unlike Lanasa, I do not make accusations I cannot back up with as my friend Erik Tenkar and Tom here say.... The Receipts.

Show less

1

Reply

@wizardtowergames

2 days ago

Why is an interesting question, and you NAILED it. I went into publishing as I loved gaming, I could create things, meet people, gratification. But when you get into it to make a 100 million in a Trademark squat... That is not a good "Why".

2

Reply

@wizardtowergames

2 days ago

I will add, Lien on property, tax refunds, lottery winnings, judgements he gets from others, liens on bank accounts.

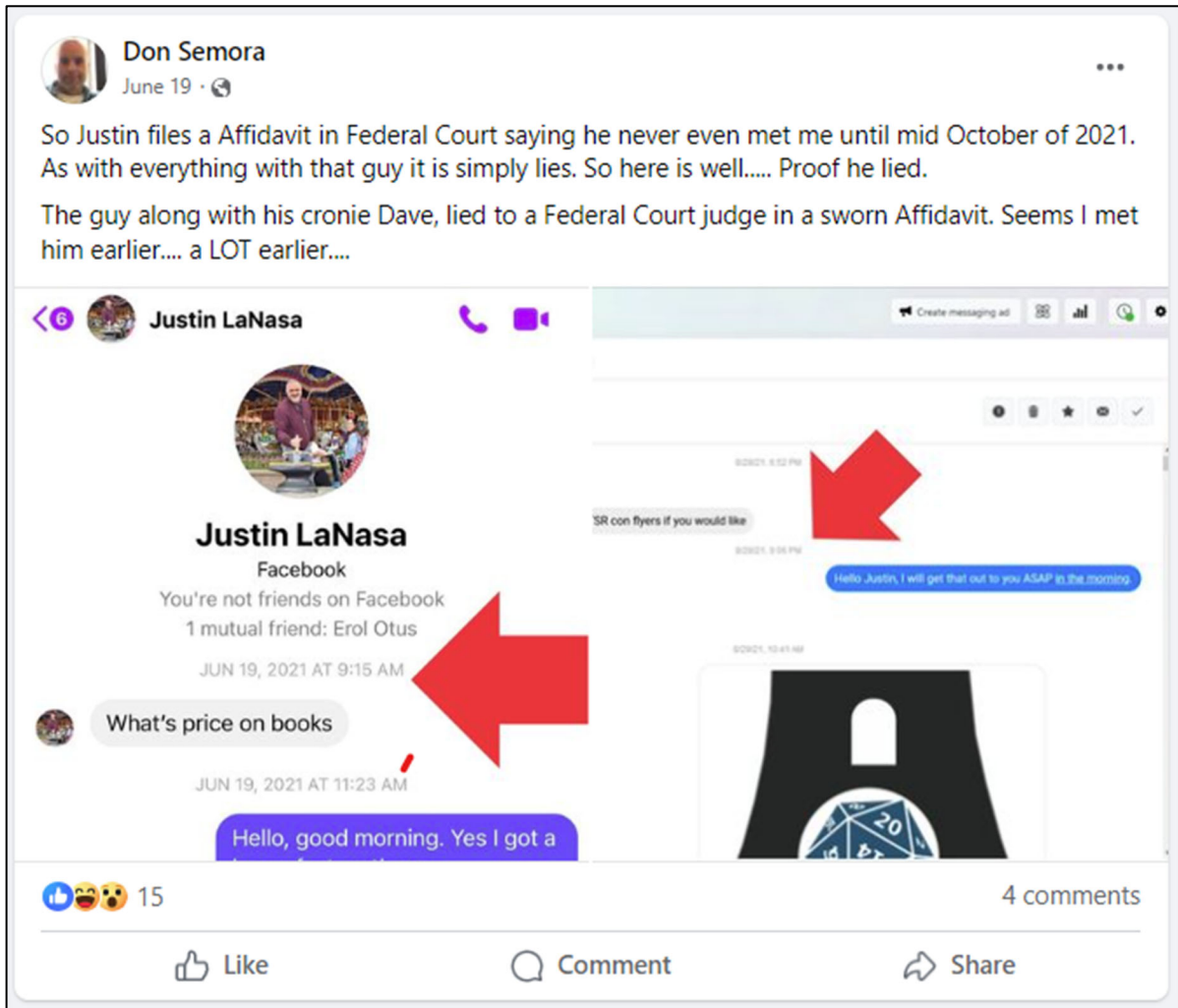
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Reply

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DECLARATION OF JUSTIN LANASA IN SUPPORT OF RESPONSE TO
MOTION TO ENFORCE THE PROTECTIVE ORDER GOVERNING
CONDUCT Page 13

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 **Jayson Elliot**
1d · 🌐

Wizards' lawyers would probably be interested to see that Justin and his buddies are still claiming that they're the "original home of Dungeons & Dragons."

<https://www.facebook.com/wfdgames/posts/pfbid028NC7LSCpgJ9SpB48tcDqPcmR8AWiyi3ZYSEoQeEmhFQP6rKvPXuK7hj1W2yU7Ss5I>



This content isn't available right now

When this happens, it's usually because the owner only shared it with a small group of people, changed who can see it or it's been deleted.



9

24



Like



Comment



Share

View 3 previous comments



Don Semora

They have one of the best Bankruptcy legal firms in the Country handling this now. I am sure they are all over and a lot more.

1d



Ed Liberatore

"It's not only a keen, spring-fed resort town..."

Another thought: Who says "keen" unironically in 2023, outside of reruns of 'Leave It To Beaver'?

12h Edited



DATED November 27, 2023, at New Hanover County, North Carolina.


Justin LaNasa

CERTIFICATE OF SERVICE

I hereby certify that on November 27, 2023, I caused to be served a true copy of the foregoing **DECLARATION OF JUSTIN LANASA IN SUPPORT OF COUNTERCLAIM DEFENDANTS' RESPONSE TO DEFENDANT AND COUNTERCLAIM PLAINTIFF'S MOTION TO ENFORCE THE PROTECTIVE ORDER GOVERNING CONDUCT** on the party or attorneys listed below, by email:

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